REMARKS

Claims 1, 2, and 8-29 are pending in the present application. Claims 3-7 have been cancelled without prejudice or disclaimer to the subject matter contained therein.

Rejection under 35 U.S.C. §103

Claim 1 has been rejected under 35 U.S.C. §103 for being unpatentable over Brintzenhofe et al. (Published US Patent Application 2005/0223320) in view of Seseck et al. (Published US Patent Application 2003/0086098). This rejection is respectfully traversed.

In formulating the rejection of independent claim 1 under 35 U.S.C. §103, the Examiner alleges that Brintzenhofe et al. discloses, at paragraph **[0011]**, a method for creating reusable composite components from interpreted pages of rendered document during dynamic document construction. Moreover, the Examiner alleges that Brintzenhofe et al. discloses, at paragraphs **[0100]** and **[0111]**, caching individual reusable document components rendered to their respective bounding box dimensions; at paragraph **[0113]**, permuting the reusable document components into composite combinations of reusable document components; at paragraph **[0125]**, caching each of composite reusable document component rendered relative to each other in a bounding box of sufficient size to adequately contain the combination; at paragraph **[0133]**, combining reusable document components in their relative positions to form composite reusable underlays; and, at paragraph **[0134]**, caching said composite reusable underlays rendered to full page size.

However, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components from the page and identifying any non-cached components. To meet this deficiency in Brintzenhofe et al., the Examiner proposes to modify Brintzenhofe et al. with the teachings of Seseck et al.

The Examiner alleges that Seseck et al. discloses, at paragraphs **[0031]** and **[0049]**, obtaining a list of document components from the page and identifying any non-cached components. Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Brintzenhofe et al. in view of Seseck et al. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 1 recites a method for creating reusable composite components from interpreted pages of rendered document during dynamic document construction by obtaining a list of document components from the page and identifying any non-cached components; caching individual reusable document components rendered to their respective bounding box dimensions; permuting the reusable document components into composite combinations of reusable document components; caching each of composite reusable document component rendered relative to each other in a bounding box of sufficient size to adequately contain the combination; combining reusable document components in their relative positions to form composite reusable underlays; and caching said composite reusable underlays rendered to full page size.

As noted above, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components from the page and identifying any non-cached components.

With respect to Seseck et al., the Examiner alleges that the webpage of Seseck et al. may be a form with multiple fields to be filled in by the user (dynamic data). Moreover, the Examiner alleges that the fields of user filled in data (dynamic data) of Seseck et al. are document components which are identified as non-cached components.

In contrast, the presently claimed invention of independent claim 1 explicitly sets forth obtaining a list of document components from the page and identifying any non-cached components. At paragraph **[0031]**, Seseck et al. discloses the generation of a list of print-ready documents or pre-ripped documents. As set forth in paragraph **[0049]**, Seseck et al. discloses that the static portions of a webpage are saved as a print-ready document or pre-ripped document and the print-ready document or pre-ripped document, not the dynamic data, is set forth in list 164. Therefore, contrary to the Examiner's assertion, Seseck et al. teaches the generation of a list of print-ready documents or pre-ripped documents, not a list of the dynamic data as offered by the Examiner.

Moreover, the presently claimed invention of independent claim 1 explicitly sets forth obtaining a list of document component**s** from the page. In contrast, as set forth in paragraph **[0049]**, Seseck et al. discloses that only a single print-ready document or

pre-ripped document is listed for the static portions of a webpage because, as noted above, Seseck et al. discloses that the static portions of a webpage are saved as a print-ready document or pre-ripped document and the print-ready document or pre-ripped document, not the dynamic data, is set forth in list 164. Therefore, contrary to the Examiner's assertion, Seseck et al. fails to teach obtaining a list of document component**s** from the page.

In summary, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components from the page and identifying any non-cached components. Moreover, Seseck et al. fails to disclose or suggest obtaining a list of document components from the page and identifying any non-cached components because Seseck et al. discloses that the static portions of a webpage are saved as a print-ready document or pre-ripped document and the print-ready document or pre-ripped document, not the dynamic data, is set forth in list 164.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of Seseck et al. fails to render the presently claimed invention, as set by independent claim 1, obvious to one of ordinary skill in the art.

Rejection under 35 U.S.C. §103

Claim 2 has been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Padgett et al. (US Patent 5,930,813). This rejection is respectfully traversed.

In formulating the rejection of independent claim 2 under 35 U.S.C. §103, the Examiner alleges that Gauthier discloses, at paragraph **[0009]**, a method for rendering pages having a combination of reusable components and non-cached components. Moreover, the Examiner alleges that Gauthier discloses, at paragraph **[0009]**, searching a cache of reusable underlays for underlays having the reusable document components needed by the page; at paragraph **[0046]**, if the correct reusable underlay is not found in cache then generating a composite reusable underlay from the reusable document components of said page and caching said reusable underlay rendered to full page size; at paragraph **[0047]**, creating a full page size overlay from the non-cached components that is retained until it is mated with the cached reusable underlay; at paragraph **[0049]**,

if the correct underlay is found in cache then retrieving the reusable underlay; and, at paragraph **[0050]**, rendering, along with the overlay, the page therefrom.

However, the Examiner recognizes that Gauthier fails to disclose assessing said rendered page for the possibility of having an underlay-overlay pair. To meet this deficiency in Gauthier, the Examiner proposes to modify Gauthier with the teachings of Padgett et al.

The Examiner alleges that Padgett et al. discloses, at column 11, lines 9-25, assessing said rendered page for the possibility of having an underlay-overlay pair. Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Gauthier in view of Padgett et al. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 2 recites a method for rendering pages having a combination of reusable components and non-cached components by assessing said rendered page for the possibility of having an underlay-overlay pair; searching, when the rendered page is accessed as having an underlay-overlay pair, a cache of reusable underlays for underlays having the reusable document components needed by the page; if the correct reusable underlay is not found in cache then generating a composite reusable underlay from the reusable document components of said page and caching said reusable underlay rendered to full page size; creating a full page size overlay from the non-cached components that is retained until it is mated with the cached reusable underlay; if the correct underlay is found in cache then retrieving the reusable underlay; and, rendering, along with the overlay, the page therefrom.

As noted above, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair.

With respect to Padgett et al., the Examiner alleges that the bounding techniques of Padgett et al. disclose assessing the rendered page for the possibility of having an underlay-overlay pair.

Contrary to the Examiner's assertions, Padgett et al. discloses, at column 11, lines 9-25, that a document is analyzed to find highlighted text to determine if the various regions of highlighted text can be bound together in a single highlighted rectangle. Padgett et al. fails to disclose any assessing of a rendered page for the possibility of having an underlay-overlay pair, as defined by the present application.

Moreover, Padgett et al. fails to disclose that the determination of various regions of highlighted text triggers a search of a cache of reusable underlays for underlays having the reusable document components needed by the page. More specifically, Padgett et al. merely disclose that the determination of various regions of highlighted text triggers the deletion of any overlapping regions (column 11, lines 26-40).

Therefore, Padgett et al. fails to disclose any assessing of a rendered page for the possibility of having an underlay-overlay pair, as defined by the present application and fails to disclose that the disclosed determination of various regions of highlighted text is related to a search of a cache of reusable underlays for underlays having the reusable document components needed by the page.

In summary, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair. Moreover, Padgett et al. fails to disclose or suggest assessing the rendered page for the possibility of having an underlay-overlay pair because Padgett et al. discloses a determination of various regions of highlighted text and the deletion of any overlapping regions based upon the determination of various regions of highlighted text.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Padgett et al. fails to render the presently claimed invention, as set by independent claim 2, obvious to one of ordinary skill in the art.

Rejection under 35 U.S.C. §103

Claims 8-27 have been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320). This rejection is respectfully traversed.

Independent claim 8

In formulating the rejection of independent claim 8 under 35 U.S.C. §103, the Examiner alleges that Gauthier discloses, at paragraph **[0009]**, an apparatus for processing documents each represented by a document description encoded in a page description language supportive of reusable data. Moreover, the Examiner alleges that Gauthier discloses, at paragraph **[0023]**, a page description language interpreter that

receives the document description; at paragraph **[0024]**, an imager, communicating with the interpreter, that creates image representations of received document components; and, at paragraph **[0047]**, a reusable document component repository that stores image representations derived from a plurality of processed documents, the reusable document component repository communicating with the interpreter and the imager to supply those ones of the image representations corresponding to selected document components of the processed documents and to receive selected image representations created by the imager during the processing of documents.

However, the Examiner recognizes that Gauthier fails to disclose a page description language interpreter that parses the document description into reusable document components and which combines the components into composites of reusable components and reusable underlays. To meet this deficiency in Gauthier, the Examiner proposes to modify Gauthier with the teachings of Brintzenhofe et al.

The Examiner alleges that Brintzenhofe et al. discloses, at paragraph **[0133]**, a page description language interpreter that parses the document description into reusable document components and which combines the components into composites of reusable components and reusable underlays. Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Gauthier in view of Brintzenhofe et al. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 8 recites an apparatus for processing documents each represented by a document description encoded in a page description language supportive of reusable data. The apparatus includes a page description language interpreter that receives the document description and parses the document description into reusable document components.

The page description language interpreter combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

The apparatus also includes an imager, communicating with the interpreter, that creates image representations of received document components; and a reusable document component repository that stores image representations derived from a

plurality of processed documents, the reusable document component repository communicating with the interpreter and the imager to supply those ones of the image representations corresponding to selected document components of the processed documents and to receive selected image representations created by the imager during the processing of documents.

As noted above, the Examiner recognizes that Gauthier fails to disclose a page description language interpreter that parses the document description into reusable document components and which combines the components into composites of reusable components and reusable underlays.

With respect to Brintzenhofe et al., the Examiner alleges that the content tree disclosed by Brintzenhofe et al. discloses a page description language interpreter that parses the document description into reusable document components and which combines the components into composites of reusable components and reusable underlays.

Contrary to the Examiner's assertions, Brintzenhofe et al. discloses, at paragraph **[0133]**, a content tree for a document containing a plurality of nodes. Brintzenhofe et al. fails to disclose a page description language interpreter that parses the document description into reusable document components.

Moreover, Brintzenhofe et al. fails to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays. More specifically, Brintzenhofe et al. merely disclose the structure of a content tree for a document without any generation of composites, as defined by independent claim 8.

Therefore, Brintzenhofe et al. fails to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In summary, the Examiner recognizes that Gauthier fails to disclose a page description language interpreter that combines some of the reusable document

components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays. Moreover, Brintzenhofe et al. fails to disclose or suggest a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays because Brintzenhofe et al. discloses the structure of a content tree for a document without any generation of composites.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by independent claim 8, obvious to one of ordinary skill in the art.

Independent Claim 17

As set forth above, independent claim 17 recites a document construction method by receiving a document description including at least one selected reusable document component and combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays; querying a reusable document component repository containing stored image representations of reusable document components to locate a selected stored image representation corresponding to the selected reusable document component; conditional upon the querying, identifying one of the stored image representations as corresponding to the selected reusable document component and retrieving the selected stored image representation corresponding to the selected reusable document component, or, not identifying one of the stored image representations as corresponding to the selected reusable document component, generating an image representation for the selected reusable document component, and storing the generated image representation in the reusable document component repository; and converting the document description to a document image representation, the converting including incorporating the selected or generated image

representation corresponding to the selected reusable document into the document image representation.

As noted above, the Examiner recognizes that Gauthier fails to disclose combining the components into composites of reusable components and reusable underlays.

With respect to Brintzenhofe et al., the Examiner alleges that the content tree disclosed by Brintzenhofe et al. discloses combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Contrary to the Examiner's assertions, Brintzenhofe et al. discloses, at paragraph **[0133]**, a content tree for a document containing a plurality of nodes. Brintzenhofe et al. fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays. More specifically, Brintzenhofe et al. merely disclose the structure of a content tree for a document without any generation of composites, as defined by independent claim 17.

Therefore, Brintzenhofe et al. fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In summary, the Examiner recognizes that Gauthier fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays. Moreover, Brintzenhofe et al. fails to disclose or suggest combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays because Brintzenhofe et al. discloses the structure of a content tree for a document without any generation of composites.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by independent claim 17, obvious to one of ordinary skill in the art.

Dependent Claims

With respect to dependent claims 9-16 and 18-29, the Applicants, for the sake of brevity, will not address the reasons supporting patentability for these individual dependent claims, as these claims depend directly or indirectly from allowable independent claims 8 and 17. The Applicants reserve the right to address the patentability of these dependent claims at a later time, should it be necessary.

Accordingly, in view of the remarks set forth above, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. §102(e).

CONCLUSION

Accordingly, in view of all the reasons set forth above, the Examiner is respectfully requested to reconsider and withdraw the present rejections. Also, an early indication of allowability is earnestly solicited.

Respectfully submitted,

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